

EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO,)
ET AL.,)
Plaintiffs,)
)
vs.) Case No. 5:21-CV-844-XR
)
GREGORY W. ABBOTT, ET AL.,)
Defendants.)

OCA-GREATER HOUSTON, ET AL.,)
Plaintiffs,)
)
vs.) Case No. 1:21-CV-780-XR
)
JOHN SCOTT, ET AL.,)
Defendants.)

HOUSTON AREA URBAN LEAGUE, ET)
AL.,)
Plaintiffs,)
)
vs.) Case No. 5:21-CV-848-XR
)
GREGORY WAYNE ABBOTT, ET AL.,)
Defendants.)

LULAC TEXAS, ET AL.,)
Plaintiffs,)
)
vs.) Case No. 1:21-CV-0786-XR
)
JOHN SCOTT, ET AL.,)
Defendants.)

Job No. 824263

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MI FAMILIA VOTA, ET AL.,)
Plaintiffs,)
)
vs.) Case No. 5:21-CV-0920-XR
)
GREG ABBOTT, ET AL.,)
Defendants)

ORAL AND VIDEO-RECORDED DEPOSITION OF RAY SHACKELFORD,
produced as a witness at the instance of the State of
Texas Defendants and duly sworn, was taken in the
above-styled and numbered cause on Friday, April 29, 2022,
from 10:08 a.m. to 5:22 p.m., before JAMES M. PLAIR,
Certified Shorthand Reporter in and for the State of
Texas, reported by computerized stenotype machine at the
offices of REED SMITH, L.L.P., 811 Main Street, Suite
1700, Houston, Texas 77002-6110, pursuant to the Federal
Rules of Civil Procedure and the provisions stated on the
record or attached hereto.

1 A. And so between myself, Mr. Robinson, uhm, our
2 volunteers from, uh, the YPs and the Guild, we probably
3 had about 20 to 30 people show up and we went with Common
4 and knocked on doors.

5 Uhm, and one of the stories or anecdotes I
6 tell people that's still funny to me -- because, you know,
7 we have been telling people to Get Out The Vote for weeks,
8 months or what have you, and there was this one particular
9 door over in the Cuney Homes, which is actually where
10 George Floyd grew up, which is why we took him there,
11 because of the significance of it, uhm.

12 And I remember this one door we knocked on
13 and the lady you can hear from the back yelling, like,
14 "Don't open the" bleeping "door", uhm, and her brother
15 opens the door and she's getting ready to come up there
16 and let me have it and she sees Common and her whole
17 demeanor changes; she starts smiling.

18 And he is like, you know, "How are you
19 doing?" She is like, "I'm fine." He's like, "Are you
20 going to go vote?" And she's like, "Ima go vote," and
21 I'm, like, "We have been telling you how to go vote."

22 But you know what? I was, like, "Whatever
23 gets you to the polls." Uhm, if it a takes every now and
24 then a celebrity or somebody to encourage people to get
25 out to vote, uhm, and even that same day, there was

1 actually an elderly woman we came across that Mr. Robinson
2 ended up taking to go help vote, uhm, and I bring that up
3 because she was somebody who was visually impaired, uhm,
4 and Mr. Robinson had to help her, like, literally tell
5 her, like, "Okay. This is what this says. This is what
6 this says," on her ballot, uhm, and so had it not been for
7 Mr. Robinson being present and being able to assist her,
8 which is something that now, potential -- not potentially,
9 is harmed as a result of SB 1, uh, because now people have
10 to actually sign some type of affidavit or something every
11 time, uh, they decide to help someone when they are
12 voting, uh, and we have already gotten feedback from the
13 community that we swerve, you know, in the Cuney Homes and
14 some of these other neighborhoods in the Third Ward,
15 Sunnyside and Fifth Ward, that they are intimidated by
16 things like this and so it makes they not want to, uhm,
17 help people.

18 And so it's not only a burden on the people
19 that want to provide assistance but it's a burden on the
20 voters that need assistance, because now, they don't have
21 access to as many people that otherwise would be willing
22 to help them.

23 Uhm, but, yeah, I think -- And as we're
24 talking, I'm starting to remember more things.

25 Q. Uh-hm.

1 Uhm, I pass the witness.

2 MR. GENECHIN: Thank you very much. Uhm, we
3 have no, uh, redirect.

4 I just want to double-check. Uh, for the
5 record, you have used, uhm, Exhibits 1 through 17. There
6 is no Exhibit 18 and then there is a nine -- There are 19,
7 20, 21.

8 MR. DISORBO: Yes, sir. I left off 18. I
9 did not use 18.

10 MR. GENECHIN: Okay. So 21 is the last one.

11 MR. DISORBO: Yes, sir.

12 MR. GENECHIN: Thank you very much. So we
13 are off the record.

14 THE VIDEOGRAPHER: Off the record. The
15 time is 5:22.

16 MR. DISORBO: All right.

17 THE REPORTER: Read and sign the transcript
18 or waive reading and signing?

19 MR. GENECHIN: We will read and sign.

20 (Deposition concluded at 05:22:04 p.m.)

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